Start of new case

Q1 Does the draft guidance cover the relevant issues about the right of access?

- [x] Yes
- [ ] No
- [ ] Unsure / don't know

If no or unsure/don’t know, what other issues would you like to be covered in it?

Q2 Does the draft guidance contain the right level of detail?

- [x] Yes
- [ ] No
- [ ] Unsure / don't know

If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

Q3 Does the draft guidance contain enough examples?

- [x] Yes
- [ ] No
- [ ] Unsure / don't know

If no or unsure/don’t know, please provide any examples that think should be included in the draft guidance.

Q4 We have found that data protection professionals often struggle with applying and defining 'manifestly unfounded or excessive' subject access requests. We would like to include a wide range of examples from a variety of sectors to help you. Please provide some examples of manifestly unfounded and excessive requests below (if applicable).

Q5 On a scale of 1-5 how useful is the draft guidance?

1 - Not at all useful	2 – Slightly useful	3 – Moderately useful	4 – Very useful	5 – Extremely useful
○	○	○	○	✓

Q6 Why have you given this score?

It neatly brings together the exceptions and clarification found in the DPA.

Q7 To what extent do you agree that the draft guidance is clear and easy to understand?

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
○	○	○	○	✓

Q8 Please provide any further comments or suggestions you may have about the draft guidance.

1) Reasonable Admin Fee. p21 sates, "You cannot charge for the time taken to deal with the request" but doesn't explain why. The GDPR simply states "the controller may charge a reasonable fee based on administrative costs" - surely time is one of those costs. Especially as processing of unstructured records (p60) does allow for the time to be changed based on of an hourly rate. 2) Processing large amounts of data. p23 states, "You cannot ask the requester to narrow the scope of their request". We get requests for 'all care records'. This may be multiple years worth of records, amounting to 10,000+ sides. Based on this we can't discuss what they actually need which is often significantly less. GDPR Recital 63.7 suggest we (the controller) can ask that, "the data subject specify the information", i.e. all or 6 months. If they still hold to 'all' then all are obviously provided.

Q9 Are you answering as:

- ○ An individual acting in a private capacity (eg someone providing their views as a member of the public)
- ○ An individual acting in a professional capacity
- ◉ On behalf of an organisation
- ○ Other

Please specify the name of your organisation:

Methodist Homes

Q10 How did you find out about this survey?

- ○ ICO Twitter account
- ○ ICO Facebook account
- ○ ICO LinkedIn account
- ○ ICO website
- ○ ICO newsletter
- ○ ICO staff member
- ○ Colleague
- ○ Personal/work Twitter account
- ○ Personal/work Facebook account
- ○ Personal/work LinkedIn account
- ◉ Other

Thank you for taking the time to complete the survey